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December 15, 2016

Mr. Mark Williams
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Volkswagen Settlement's Zero Emission Vehicle Investment Plan

Dear Mr. Williams,

The Center for Transportation and the Environment (CTE) appreciates the opportunity to present comments to the Air Resources Board (ARB) for consideration in California's summary guidance to VW as it develops its first draft California ZEV Investment Plan. As a nonprofit, 501(c)(3) organization that develops technologies and implements solutions to achieve energy and environmental sustainability, we recognize the importance of the opportunities available through the VW Settlement's ZEV Investment Plan.

CTE is very supportive of ARB's infrastructure priority to expand ZEV technology across more transportation sectors. Significant focus and investments have been placed on the consumer zero emission vehicle market, leaving a gap for medium- and heavy-duty vehicles. More and more bus and truck OEMs are developing opportunities to commercialize zero emission vehicles and it is vital to have a fueling network in place to support and encourage future deployments. According to *"Delivering Opportunity How Electric Buses and Trucks Can Create Jobs and Improve Public Health in California,"* a report released by the Union of Concern Scientists, heavy-duty vehicles account for seven percent of California's global warming emissions and are the single largest source of NO_x emissions, emitting 33% of the state's total. Enabling fleets to deploy zero emission vehicles as an alternative to their gasoline and diesel counterparts will result in significant emission reductions for the state and contribute to efforts to meet air quality and greenhouse gas reduction goals.

Furthermore, we commend ARB's inclusion of hydrogen investments in its infrastructure priorities. Fuel cell technology is a viable zero emission transportation option and availability of fueling is key to successful deployments. Again, we are pleased to see the reference to investments that are scalable to larger vehicle categories. Availability of fueling for medium- and heavy-duty vehicles is a weakness in the developing hydrogen fuel cell station network. It is vital to adopt strategies to ensure there are accessible, well-located stations to support deployments of zero-emission medium- and heavy-duty fuel cell vehicles by fleet operators.

Finally, we support the inclusion of zero emission transit in the ZEV Access category. Exposing the public to zero emission transportation options through transit benefits not only the riding public, but the transit agencies and the communities which they serve. Riders benefit from an enhanced travel experience, transit agencies benefit from deploying the most fuel-efficient fleets in order to achieve the greatest reduction in energy consumption, and the community as a whole benefits from reduced emissions and the quiet operation of the buses. This is of particular relevance to disadvantaged communities, where many people reside who are entirely transit-dependent.

Thank you again for the opportunity to provide input to the guidance ARB will be providing to VW on the California ZEV Investment Plan. If you have any questions, please do not hesitate to contact me at (510) 851-0625 or at jaimie@cte.tv.

Sincerely,


Jaimie Levin
Director West Coast Operations